

RE: FRANK M LANIER

) Case No. 17 B 03649
)
Debtor) Chapter 13
)
) Judge: CAROL A DOYLE

NOTICE OF MOTION

FRANK M LANIER

DAVID M SIEGEL

via Clerk's ECF noticing procedures

2053 W GARFIELD BLVD #2
CHICAGO, IL 60636

Please take notice that on August 07, 2018 at 9:15 am my designee or I will appear before the Honorable Judge CAROL A DOYLE at 219 South Dearborn Courtroom 742, Chicago, IL and present the motion set forth below.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail at 55 E Monroe St., Chicago, IL 60603 or by the methods indicated on July 25, 2018.

/s/ Tom Vaughn

TRUSTEE'S MOTION TO DISMISS FOR TERM OF PLAN

Now comes Tom Vaughn, Trustee in the above entitled case and moves the Court to dismiss this case in support thereof states:

1. On February 08, 2017 the Debtor filed a petition and plan under Chapter 13 of Title 11 U.S.C.
2. The debtor's plan was confirmed on May 09, 2017, for a period of 36 months.
3. The plan will complete in 71 months, from the date of confirmation .

WHEREFORE, the Trustee prays that this case be dismissed for material default by the debtor with respect to a term of a confirmed plan, pursuant to § 1322 (d) and § 1307 (c) (6).

Respectfully submitted,

TOM VAUGHN
CHAPTER 13 TRUSTEE
55 E. Monroe Street, Suite 3850
Chicago, IL 60603
(312) 294-5900

/s/ Tom Vaughn